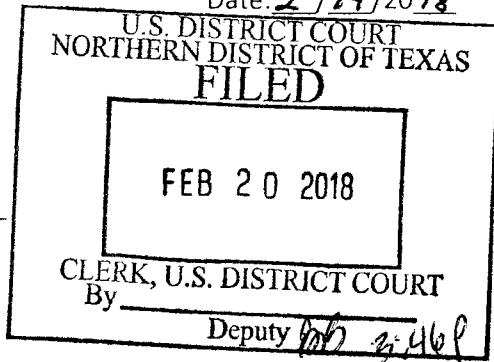


Case No. 4:00-CR-054-Y

THOMAS REEDY
 [c/o United States Penitentiary Marion
 4500 Prison Road
 Marion, Illinois 62959]

NOTICE
 Private International Remedy Demand-
 Purge of Contempt-
 Prayer for Forgiveness-
 Tender of Offer-
 Private Negotiable Performance Bond-



Notice to Agent is Notice to Principal - Notice to Principal is Notice to Agent
 (Applicable to all Successors and Assigns)

To:

UNITED STATES OF AMERICA, United States of America, UNITED STATES, United States
 950 Pennsylvania Avenue, N.W.
 Washington, D.C. 20530

USPS#: 7017 1450 0000 0834 6992

UNITED STATES DEPARTMENT OF JUSTICE ATTORNEY GENERAL JEFF SESSIONS
 Jeff Sessions (individual capacity) and Successor(s)
 950 Pennsylvania Avenue, N.W.
 Washington, D.C. 20530

USPS#: 7017 1450 0000 0834 7012

UNITED STATES DEPARTMENT OF JUSTICE ATTORNEY FRANK L. GATTO - DOJ
 Frank L. Gatto (individual capacity) and Successor(s)
 U.S. Attorney's Office
 801 Cheery Street, Suite 1700
 Fort Worth, Texas 76102

USPS#: 7017 1450 0000 0834 7036

UNITED STATES DISTRICT COURT CLERK FOR THE NORTHERN DISTRICT OF TEXAS, FORT WORTH DIVISION NANCY DOHERTY
 Nancy Doherty (individual capacity) and Successor(s)
 501 West Tenth Street
 Fort Worth, Texas 76102

USPS#: 7017 1450 0000 0834 7005

UNITED STATES DEPARTMENT OF JUSTICE, FEDERAL BUREAU OF PRISONS DIRECTOR MARK S. INCH
 Mark S. Inch (individual capacity) and Successor(s)
 320 1st Street, N.W.
 Washington, D.C. 20534

USPS#: 7017 1450 0000 0834 7029

UNITED STATES PENITENTIARY MARION WARDEN WILLIAM "BILL" TRUE
 William "Bill" True (individual capacity) and Successor(s)
 4500 Prison Road
 Marion, Illinois 62959

: Institution Mailbox

1. Comes now offeror, Thomas Kent Reedy, a natural man, a private domiciliary of Texas state, a non-resident alien to the UNITED STATES OF AMERICA; United States of America; UNITED STATES, and; United States, and, Grantor-Beneficiary, hereinafter "Offeror", on behalf of the Defendant, THOMAS REEDY, an artificial person, hereinafter "Defendant", in Case Number 4:00-CR-054-Y, hereinafter "Account", in regard to the INDICTMENT/ TRUE BILL, hereinafter "Presentment", filed in the UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION, hereinafter "USDC".

2. Offeror hereby gives Notice to any and all parties, either directly or indirectly, claiming any, either legal or equitable, interest and/or title in the property known as Thomas Kent Reedy, a physical body, a natural man, approximately five feet and eight inches in height, approximately 162, one hundred and sixty two, pounds in body weight, and a caucasion by race, hereinafter "Property", and to the seizure and/or detainment and/or incarceration of the Property (Offeror), including, but not limited to, the UNITED STATES OF AMERICA; United States of America; UNITED STATES; United States; UNITED STATES DEPARTMENT OF JUSTICE ATTORNEY GENERAL JEFF SESSIONS; Jeff Sessions (individual capacity) and Successor(s); UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF PRISONS DIRECTOR MARK S. INCH; Mark S. Inch (individual capacity) and Successor(s); FEDERAL BUREAU OF PRISONS UNITED STATES PENITENTIARY WARDEN WILLIAM "Bill" TRUE; William "Bill" True (individual capacity) and Successor(s); UNITED STATES DEPARTMENT OF JUSTICE ATTORNEY FRANK L. GATTO-DOJ; Frank L. Gatto (individual capacity) and Successor(s); UNITED STATES DISTRICT COURT CLERK FOR THE NORTHERN DISTRICT OF TEXAS, FORT WORTH DIVISION NANCY DOHERTY, Nancy Doherty (individual capacity) and Successor(s), hereinafter "Offerees".

3. A) Offeror, by this "NOTICE, Private International Remedy Demand-, Purge of Contempt-, Prayer for Forgiveness-, Tender of Offer-, Private Negotiable Performance Bond-", hereinafter "Proffer", is making good faith effort to purge and/or cure any and all contempt, dishonor and/or misconduct of/by Offeror in regard to the Account filed in the USDC.

B) Offeror sincerely repents for Offeror's inadvertent contempt, dishonor, and/or failure to perform timely to accept, setoff, settle in full and discharge Offerees' claim(s), including, but not limited to any and all, either

direct or indirect, charges, costs of attachment (incarceration), attorney fees and services, court costs, expenses, taxes, fines, bonds, fees, interest, penalties, and the like, hereinafter "Accounts", in regard to the Presentment filed by U.S. Attorneys, Paul E. Coggins, Terri Moore, and Ronald C. H. Eddins, in the Account, filed in the USDC.

C) Your Offeror makes no excuse for Offeror's misconduct, and/or fault, and promises to never do such misconduct again and prays that Offerees forgive your Offeror for the dishonor in commerce.

4. A)

TENDER OF OFFER

a) Offeror presents this Tender of Offer to the UNITED STATES DISTRICT COURT CLERK FOR THE NORTHERN DISTRICT OF TEXAS, FORT WORTH DIVISION NANCY DOHERTY, Nancy Doherty (individual capacity) and Successor(s), hereinafter "Clerk of Court", for full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) of the Account/Accounts, and release of the collateral (Property/Offeror) as herein more fully appears.

b) As evidenced by the Presentment, attached hereto, Offeror has accepted said Presentment, Nunc Pro Tunc, the 17th day of May, 2000, as Grantee, and has properly endorsed and returned said Presentment, as Grantor-Beneficiary, to the Clerk of Court, whom has a fiduciary duty as holder in due course of the Presentment, to be deposited to the Order of the United States for full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) of the Account/Accounts, Nunc Pro Tunc, the 17th day of May, 2000, pursuant to statutes and public policy as evidenced at:

- i) Presidential Executive Order Number 11491 § 18d
- ii) 29 C.F.R. § 204.53, 204.54 (1969), reprinted as amended in Title 5 U.S.C. § 7301 at #108 (1974).
- iii) Title 12 U.S.C. § 95a(2)
- iv) Article 9, Uniform Commercial Code, § 340, (a) - (c), Effectiveness of right... (see also District of Columbia Code § 28:9-340 (a)-(c))

c) Offeror respectfully demands that the Offerees complete and present, any and all, financial forms, perform all acts, and take any actions as necessary to properly complete the setoff, settle in full and close the Account/Accounts.

B) Offerees failure to specifically perform their duties, timely, pursuant to this Proffer, shall constitute Offerees' fault, whereas Offerees' fault shall constitute Offerees' informed consent, stipulation and agreement to the following:

- 1.) Offerees have accepted the Presentment and Offeror's Proffer, and;
- 2.) Offeror has properly accepted the Presentment, as Grantee, endorsed and returned the Presentment for full setoff, settlement and closure of the related Account/Accounts, as Grantor-Beneficiary, and;
- 3.) Offerees agree to present any remaining obligation(s), related to the Account/Accounts, to Offeror for acceptance, endorsement and return for full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) related to the Account/Accounts, and;
- 4.) Offeror stand ready, willing and able to fully setoff, settle and close any remaining obligation(s) of the Account/Accounts to purge Offeror's contempt and/or dishonor, immediately upon presentation of the title(s), bill(s), instrument(s), document(s) of title(s), hereinafter "Authority", that is/are the power to grant the authority to continue seizure and/or detainment and/or incarceration of, and/or claim to, the Property (Offeror), and;
- 5.) Offeror hereby presents this Tender of Offer to Offerees, in good faith, for full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) of the Account/Accounts, filed in the USDC, and;
- 6.) Offeror, as a right, demands that Offerees, as fiduciary and holder in due course of the Presentment, deposit Presentment to the Order of the United States and credit the Account/Accounts, pursuant to statutes and public policy, as evidenced at Title 12 U.S.C. § 95a(2), that states in pertinent part:
 - i) "Any Payment, conveyance, transfer, assignment, or delivery of property or interest therein, made to or for the account of the United States, or as otherwise directed, pursuant to this subdivision or any

rule, regulation or direction issued hereunder, shall to the extent thereof, be a full acquittance making the same; and no person shall be held liable in any court for or in respect to anything done or omitted in good faith in reliance on, this subdivision, or any rule, regulation, instruction or direction issued hereunder." and;

7.) Offeror, as a right, demands that Offerees issue, or cause to be issued, the full setoff, settlement,

closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the

obligation(s) of the Account/Accounts, for the immediate release and discharge of both the

Defendant and the Property (Offeror), and;

8.) Offerees, as fiduciary, shall forthwith present said acquittance and discharge (receipt), for the

Account/Accounts, to the Offeror and the FEDERAL BUREAU OF PRISONS at UNITED STATES

PENITENTIARY MARION, as necessary to effect the release and discharge of both the Defendant and

the Property (Offeror).

C) Offerees' default, by Offerees' failure to specifically perform pursuant to this Proffer timely, shall constitute Offerees' informed consent, stipulation and agreement to the following:

1.) Offeror has the right to setoff, settle and close the Account/Accounts pursuant to statutes and public policy as evidenced at:

i) Title 12 U.S.C. § 95a(2)

ii) Article 9, Uniform Commercial Code, § 340, (a)-(c), Effectiveness of right... (see also District of Columbia Code § 28:9-340 (a)-(c)) and;

2.) If tender of payment of an obligation to pay an instrument is made to a person entitled to enforce the instrument, and the tender is refused, there is discharge, to the extent of the amount of the tender of the obligation of an endorser or accommodation party having a right to recourse with respect to the obligation to which the tender relates, and;

3.) Offeror, by this Proffer, is making demand as an unconditional offer to perform immediately, pursuant to this Proffer, to privately setoff, settle and close the Account/Accounts, in full, that, as a result, Offeror has the immediate right to a full acquittance and discharge of the Account/Accounts, for all purposes of the

obligation(s) of the Account/Accounts, expungement of the record both privately and publicly, including, but not limited to, disincarceration of the Property (Offeror), and Offerees' duty to issue, or cause to be issued, a full acquittance and discharge of the Account/Accounts, expungement of the record both privately and publicly, and;

4.) Offerees, as fiduciary and holder in due course of the Presentment, have a fiduciary duty, by Presidential Order # 11491 § 18d, in accordance with page #'s 4 and 5, section 4B, paragraphs "6.)", "7.)", and "8.)" of this Proffer, and;

5.) Offerees, as a matter of law, are duty bound to perform upon this demand the duties set forth in page #'s 4 and 5, section 4B, paragraphs "6.)", "7.)", and "8.)" of this Proffer, that, as a result, Offeror has the immediate right to a full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) of the Account/Accounts, privately, the immediate disincarceration of the Property (Offeror) in specie and expungement of the record both privately and publicly, and;

6.) Offerees' failure to perform his/her/its/their duty/obligation(s) will cause and continue to cause dishonor and irreparable injury in fact to Offeror, by the unjust imposition of the charges of the Account/Accounts and unlawful incarceration, for failing to setoff, settle and close the Account/Accounts, in full, and issue, or cause to be issued, a full acquittance and discharge, and;

7.) Any of these persons (Offerees), when acting for others in reference to matters of property or business entrusted to their care and management, are to that extent, a trustee and subject to all the obligations imposed by Courts of Equity on trustees, and held chargeable for all losses resulting from their want of due diligence, equally with losses resulting from downright bad faith, and;

8.) Fault and/or default, by Offerees failure to specifically perform pursuant to this Proffer, shall constitute a valid contract between the parties by Offerees' acceptance of this Proffer, informed consent, stipulation and agreement to all facts, allegations, terms, and conditions as stated herein, and;

9.) Offerees' failure to specifically perform under the contract, pursuant to this Proffer, shall constitute

Offerees' informed consent, stipulation and agreement that Offerees have, are and continue to act in bad faith and are knowingly, willfully, and intentionally obstructing justice, and;

10.) Offerees failure to specifically perform under the contract, pursuant to this Proffer, shall constitute Offerees' informed consent, stipulation and agreement to a willfull, purposeful, and complete material breach of the valid contract between the parties, by the Offerees, and;

11.) In the case of the Clerk of Court's breach of fiduciary duty (acting in bad faith), Offerees, by acceptance of this Proffer, consent, stipulate, and agree that UNITED STATES DEPARTMENT OF JUSTICE ATTORNEY GENERAL JEFF SESSIONS, Jeff Sessions (individual capacity) and Successor(s), as respondent superior, shall assume responsibility for fiduciary duty, and its breach as set forth in page #'s 4 and 5, section 4B, paragraphs "6.)", "7.)", and "8.)" of this Proffer, and;

12.) Offeror is a private domiciliary of Texas state, a natural man, a non-resident alien to the UNITED STATES OF AMERICA; United States of America; UNITED STATES, and; United States, and Grantor-Beneficiary on behalf of the Defendant in the Account filed in the USDC, behing held merely as a surety and/or accomodation party for contempt related to the Account/Accounts, and;

13.) The Account/Accounts filed in the USDC is/are fully setoff, settled and closed, and;

14.) Offerees' failure to present to the Offeror the requisite Authority for Offeror's acceptance, as Grantee, to be properly endorsed and returned, as Grantor-Beneficiary, shall constitute informed consent, stipulation, and agreement between the parties that all debt and/or obligation(s), and the like, relating to the Account/Accounts filed in the USDC, are hereby discharged, in full, and Offerees, as a matter of duty, shall immediately issue, or cause to be issued, a full setoff, settlement, closure, and, full acquittance and discharge of the Account/Accounts, for all purposes of the obligation(s) of the Account/Accounts, privately, and immediately disincarcerate the Property (Offerer) in specie and expunge the record both privately and publicly, and;

15.) Offeror hereby has the right to both the legal and equitable title to the Property (Offeror), and;

16.) Offeror has the capacity to sue and be sued, and;

- 17.) Offeror is of sound mind, and;
- 18.) Offeror is of legal age of majority, and;
- 19.) Offeror is competent to testify if called upon, and;
- 20.) Damages alone are inadequate to bring complete justice for the irreparable damage caused to Offeror by the direct and proximate acts of Offerees, and;
- 21.) That damages and specific performance are practicable and would be adequate as a remedy to do complete justice to the injured party (Offeror), and;
- 22.) That a suit in Equity to compel specific performance is appropriate to enforce this contract between the Offeror and Offerees in case of its breach, and;
- 23.) FORUM SELECTION CLAUSE - Offerees' failure to specifically perform under the contract, pursuant to this Proffer, shall constitute informed consent, stipulation, and agreement between the parties to formal lawful resolution and that any dispute(s) related to this live controversy will be decided in accordance with the rules, principles and practice of Equity in the UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA, and;
- 24.) INJUNCTIVE RELIEF - Offerees consent, stipulate, and agree that injunctive relief, in the form of preliminary injunction, is proper in the event Offerees fail (act in bad faith) to specifically perform under the contract, pursuant to this Proffer, and;
- 25.) Offerees consent, stipulate, and agree that all costs and expenses, including, but not limited to, court costs, attorney fees and services, travel expenses, room and board, and the like, regarding settlement of this live controversy shall be paid by the Offerees, and;
- 26.) Offeror's contempt, in regard to the Account/Accounts filed in the USDC, is purged, that any dishonor and/or default is cured and Offeror is forgiven, and;
- 27.) HE WHO WANTS EQUITY MUST DO EQUITY - Offeror gives notice that Offeror consents to giving Offerees such corresponding rights as Offerees may also be entitled to, in respect to the subject-matter relating to the contract between the parties, pursuant to this Proffer, and;

28.) RULE OF LAW - A) Consent makes the law. B) Parties consent, stipulate, and agree to specifically perform under the contract, pursuant to Offeror's Proffer. C) Wherefore Offeror has the right to relief demanded, and;

29.) Notice to Agent is Notice to Principal - Notice to Principal is Notice to Agent (applicable to all Successors and Assigns), and;

30.) Equity aids the vigilant, not those who slumber on their rights, and;

31.) Laches, delay, indifference and passive acquiescence, when not in any way caused by the other party, are hurtful, if not fatal, to complainant's (Offeror's) rights in a Court of Equity, and;

32.) The doctrine of Equity requires good works, as well as good faith, and is especially enforced against trustees, and all other persons, who act in a capacity of trust for others, especially in a fiduciary capacity, such as executors, administrators, guardians, agents, receivers, clerks of court, and of individuals, secretaries, treasurers, and other offices of firms, societies and corporations, book-keepers, guardians ad-litem, next friends, attorneys and confidential advisors, and;

33.) DAMAGE - That a breach of contract will cause irreparable injury to the Offeror, resulting in a live controversy, by the unjust imposition of the charges of the Account/Accounts and unlawful incarceration, due to Offerees' failure (acting in bad faith) to specifically perform under the contract, pursuant to this Proffer, and;

34.) DAMAGES - Offerees consent, stipulate, and agree that one million five-hundred thousand United States Dollars (\$1,500,000) per diem, in damages, are to be paid to the Offeror, as a reasonable liquidation of the loss that will accrue to the Offeror in case of Offerees' failure to specifically perform under the contract, pursuant to this Proffer, from first day of fault until Offerees specifically perform and pay all damages in full.

D)

TIME IS OF THE ESSENCE

a) Offerees are hereby given thirty (30) days, from the receipt of this Proffer, to specifically perform pursuant to this Proffer, or provide a responsive answer by returning the Proffer to the Offeror, within thirty (30) days of receipt, with a legal notice of dishonor, and list all deficiencies and/or timely rebut each and every fact, allegation, term and condition and provide documented legal proof to the contrary by verified affidavit.

b) RESPONSIVE ANSWER: Should Offerees fail to specifically perform, Offeror demands that Offerees answer to any disputed facts and/or allegations upon his/her/its/their corporal oath/affirmation according to the best and utmost of his/her/its/their personal, first-hand, actual knowledge, full, true, direct, and perfect answer make to all and singular the several matters and things hereinabove contained, and that as fully and particularly as if the same were there in again repeated, and thereunto severally and distinctly interrogated with documented legal proof to the contrary.

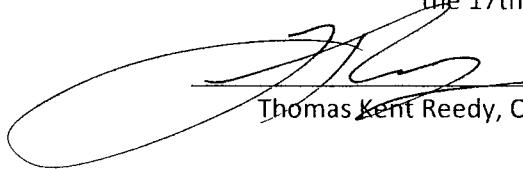
c) Fault, and/or default, failure to specifically perform or provide a responsive answer, pursuant to the terms and conditions of this Proffer, shall constitute informed consent, stipulation, and agreement to all facts, terms, and conditions as stated in this Proffer and a valid contract between the Offeror and Offerees.

d) If additional time is needed to respond in writing to the Offeror, Offerees need merely request additional time, in writing, within thirty (30) days of receipt of this Proffer, and an additional ten (10) days will be granted.

e) This Proffer is Offeror's good faith effort and attempt to resolve a grievance by private administrative process prior to seeking formal lawful resolution in Equity.

Executed under signature and seal, Nunc Pro Tunc,

the 17th day of May, 2000



(SEAL)
Thomas Kent Reedy, Offeror

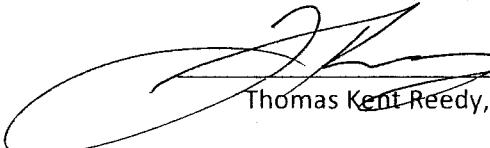
5.

PRIVATE NEGOTIABLE PERFORMANCE BOND

- A) Offeror presents this Private Negotiable Performance Bond, hereinafter "Bond", in good faith, in regard to Offeror's Tender of Offer, to the Clerk of Court.
- B) Offeror is acting, also as principal and surety with regard to this Bond.
- C) Offeror hereby agrees to pay all costs incurred (Accounts), which may be assessed/adjudged against the Offeror, payable to the Clerk of Court, regarding this Proffer.
- D) Offeror hereby agrees to pay all costs of enforcement of paragraph "c)" hereinabove, should Offerees fail to pay costs assessed/adjudged regarding paragraph "c)" hereinabove payable to the Clerk of Court.

Exececuted under signature and seal, Nunc Pro Tunc,

the 17th day of May, 2000



(SEAL)

Thomas Kent Reedy, Offeror

VERIFICATION

Illinois State)
)
Williamson County)

Affiant, Thomas Kent Reedy, hereinafter "Affiant, makes solemn affirmation that the statements in his foregoing "NOTICE", Private International Remedy Demand- Purge of Contempt- Prayer for Forgiveness- Tender of Offer- Private Negotiable Performance Bond-" are made as of Affiant's own personal, first-hand, actual knowledge, and are true, correct, complete, and not misleading, as a free act and deed, under penalty of perjury. Affiant is of sound mind, of legal age of majority, has not made these statements under threat, duress, or coercion, and is competent to testify if called upon.

Executed under signature and seal this 14th day of February, 2018

 (SEAL)
Thomas Kent Reedy, affiant

CERTIFICATE OF SERVICE

Affiant, hereby certifies that true and correct copy(s) of the foregoing: "NOTICE, Private International Remedy Demand- Purge of Contempt- Prayer for Forgiveness- Tender of Offer- Private Negotiable Performance Bond-", totaling 12 pages, and "Presentment", totaling 18 pages, have been delivered to each of the individuals listed on Page 1 of this Proffer, at the respective addresses listed on same, and verified by each respective Certified USPS number.

Executed under signature and seal this 14th day of February, 2018

 (SEAL)
Thomas Kent Reedy, affiant

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

MAY 17 2000

NANCY DOHERTY, CLERK

By Deputy

UNITED STATES OF AMERICA

VS.

THOMAS REEDY (1)
JANICE REEDY (2)
LANDSLIDE, INC. (3)
R.W. KUSUMA (4)
BORIS GREENBERG (5)
HANNY INGGANATA (6)

*

*

* CRIMINAL NO. 4:00-CR-054-Y

* (Supersedes 04-12-00 Indictment)

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The Grand Jury charges:

COUNT 1
CONSPIRACY

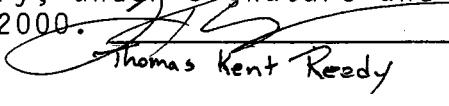
A. THE DEFENDANTS AND CONSPIRATORS

At all times material to this indictment:

1. THOMAS REEDY, and JANICE REEDY, Defendants, owned, operated, and controlled the business known as LANDSLIDE, INC., and LANDSLIDE, INC. operated at the REEDYS' order and direction.
2. LANDSLIDE, INC. (hereinafter LANDSLIDE), Defendant, is a Texas corporation whose principal place of business was Fort Worth, Texas, and the REEDYS' personal residence. LANDSLIDE operated and collected moncy under the names KEYZ, AVS, AVSGOLD, AND CLICZ.
3. R.W. KUSUMA, BORIS GREENBERG, and HANNY INGGANATA, Defendants, were Indonesian and Russian world wide internet webmasters, who initiated, maintained, and operated internet web sites which could be accessed by computers in the United States of America.

15 Certified a true copy of an instrument
on file in my office on 10/20/2017
Clerk, U.S. District Court,
Northern District of Texas
By Deputy

Private-Priority-Special Acceptance, By:
Grantee, under signature and seal, Nunc Pro Tunc
the 17th Day of May, 2000.
Thomas K. Reedy
Seal

Negotiable, special deposit, private priority, to the order of
the United States, for full acquittance and discharge, pursuant
to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000.  (Seal)

Thomas Kent Reedy

Private-Priority-Special Acceptance, By: Grantee, under signature
and seal, Nunc Pro Tunc the 17th day of May, 2000.



Thomas Kent Reedy (Seal)

B. OBJECTS OF THE CONSPIRACY

Beginning in approximately 1997 and continuing up to and including the date of this indictment, **LANDSLIDE, INC., THOMAS REEDY, JANICE REEDY, R.W. KUSUMA, BORIS GREENBERG, and HANNY INGGANATA**, and others, both known and unknown to the Grand Jury, in the Northern District of Texas and elsewhere, knowingly combined, conspired, confederated, and agreed to transport and caused to be transported, in interstate and foreign commerce, by various means including computer operations, the production of visual depictions, including the use of a minor person engaging in sexually explicit conduct, and such visual depictions were of such conduct, in violation of Title 18, U.S.C., Section 2252.

C. MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy and agreement to transport productions in interstate and foreign commerce of visual depictions of a minor engaging in sexually explicit conduct, herein referred to as "productions" that:

1. A part of the conspiracy was that **LANDSLIDE, Thomas Reedy and Janice Reedy**, operated as a business to provide electronic computer links, advertisements, and a credit card verification service that acted as an electronic gateway to "productions" of visual depictions of minors engaging in sexually explicit conduct at the internet sites of webmaster conspirators **R.W. KUSUMA, BORIS GREENBERG and HANNY INGGANATA, and others;**

Negotiable, special deposit, private priority, to the order of
the United States, for full acquittance and discharge, pursuant
to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000.  (Seal)

Thomas Kent Reedy

2. It was a part of the conspiracy that internet customers and subscribers of said "productions" were required to provide a valid credit card number and charge authorization to **LANDSLIDE**, in order to gain access by user name and password from **LANDSLIDE** to the conspirator webmaster's "productions" on the internet;

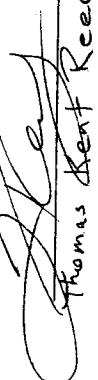
3. A part of the conspiracy agreement was that **LANDSLIDE** would verify and debit the internet customer's credit card and issue a user name and password, which allowed customers access to the conspirators website containing "productions" of depictions of minors engaged in sexually explicit conduct;

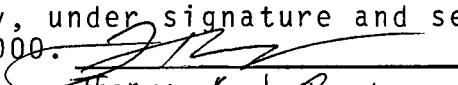
4. It was a part of the conspiracy that **LANDSLIDE** charged each customer various fees of approximately \$29.95 per month, for access each month to the said "productions";

5. A part of the conspiracy was that **THOMAS REEDY, JANICE REEDY, AND LANDSLIDE** maintained communications and financial dealings with the conspirator webmasters of said "productions" that provided for the conspirators to communicate and share in the money collected for sale of user name, passwords and computer access to the "productions";

6. During the conspiracy and as a part of the conspiracy **LANDSLIDE, THOMAS REEDY and JANICE REEDY** collected over a million dollars and paid their foreign conspirator webmasters approximately two-thirds of the money by check or electronic wire transfer and kept the balance of

Private-Priority-Special Acceptance, By: Grantee, under signature
and seal, Nunc Pro Tunc the 17th day of May, 2000.


Thomas Bent Reedy
(Seal)

Negotiable, special deposit, private priority, to the order of
the United States, for full acquittance and discharge, pursuant
to the jAct evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
 (Seal)

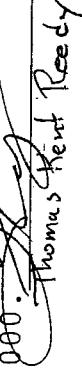
money as their share of the illegal income;

7. It was a part of the conspiracy that **LANDSLIDE, THOMAS REEDY, AND JANICE REEDY** established an internet bulletin board to promote the business of "productions" and child pornography, including notices, promotions, advertisements, marketing and sale;
8. It was a part of the conspiracy that **LANDSLIDE, THOMAS REEDY, AND JANICE REEDY** possessed images of "productions" and child pornography to facilitate and promote the said business and to facilitate website construction and sales.

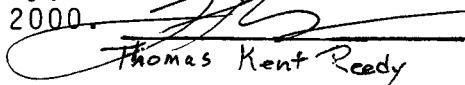
D. OVERT ACTS COMMITTED IN FURTHERANCE OF THE CONSPIRACY

In order to accomplish the objects of the conspiracy, the Defendants committed among others, each of the incorporated allegations contained in Counts 2-44, as overt acts, in furtherance of the conspiracy. A violation of Title 18 United States Code Section 2252(a)(1) and (b)(1).

COUNTS 2 through 25

Private-Priority-Special Acceptance, by: Grantee, under signature
and seal, Nunc Pro Tunc the 17th day of May, 2000. 
(Seal)

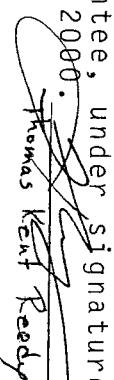
For each count stated and on or about the date stated for each count in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC.**, Defendants, did knowingly and unlawfully transport and cause to be transported, in interstate and foreign commerce by various means including computer, the production of a visual depiction involving the use of a minor person engaging in sexually explicit conduct and such visual depiction was of such conduct as stated for each count at the

Negotiable, special deposit, private priority, to the order of the United States, for full acquittance and discharge, pursuant to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000.  (Seal)

Thomas Kent Reedy

internet site and image stated for each count. Each count a violation of Title 18, United States Code, Sections 2252 and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
2	05-06-99	Lascivious Exhibition of minor female genitals and pubic area in play pool	Blackcat Lolita Photo Series bc_002.jpg
3	05-06-99	Oral sex contact by minors with lascivious genital exhibition	Lolita Hardcore gal01_005.jpg
4	05-06-99	Male and female minors in lascivious exhibition of genitals and pubic area	Lolita Hardcore gal01_008.jpg
5	05-06-99	Minor female performing oral sex on minor male with lascivious genital exhibition	Lolita Hardcore gal01_003.jpg
6	05-06-99	Minor male and female in lascivious exhibition of genitals and pubic area	Lolita Hardcore gal01_007.jpg
7	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-00.jpg
8	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-07.jpg
9	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-12.jpg
10	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_001.jpg

Private-Priority-Special Acceptance, By: Grantee, under Signature and seal, Nunc Pro Tunc the 17th day of May, 2000. 
 Thomas Kent Reedy (Seal)

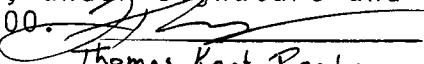
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the 17th day of May, 2000.  (Seal)

Thomas Kent Reedy

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
11	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_004.jpg
12	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_007.jpg
13	06-11-99	Adult male performing genital intercourse with minor female	Child Rape sample1.jpg
14	06-11-99	Minor female performing oral sex on an adult male	Child Rape sample3.jpg
15	06-11-99	Minor female in bondage performing oral sex on adult male	Child Rape sample5.jpg
16	06-15-99	Adult performing oral sex on minor female	Children of God 1.jpg
17	06-15-99	Minor female performing oral sex on a male	Children of God 105.jpg
18	06-15-99	Adult male performing genital intercourse with minor female	Children of God 96.jpg
19	06-15-99	Minor female masturbating adult male	Children of God a13.jpg
20	06-15-99	Minor female performing oral sex on adult male	Children of God a59.jpg
21	06-11-99	Minor female lascivious exhibition of genitals	Just Grow Up 3.jpg
22	06-11-99	Lascivious exhibition of genitals of minor male and minor female	Just Grow Up 35.jpg

Private-Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc Pro Tunc the 17th day of May, 2000.


 Thomas Kent Reedy (Seal)

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to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
(Seal)

Thomas Kent Reedy

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
23	06-11-99	Minor female masturbating adult male	Just Grow Up 45.jpg
24	06-11-99	Minor female masturbating adult male	Just Grow Up cindy14.jpg
25	06-15-99	Minor female performing oral sex on an adult male	Children Forced to Porn 252.jpg

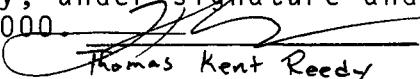
COUNTS 26 through 30

For each count stated and on or about the date stated for each count in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and R. W. KUSUMA**, Defendants, did knowingly and unlawfully transport and cause to be transported, in interstate and foreign commerce by various means including computer, the production of a visual depiction involving the use of a minor person engaging in sexually explicit conduct and such visual depiction was of such conduct as stated for each count at the internet site and image stated for each count. Each count a violation of Title 18, United States Code, Sections 2252 and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
26	09-02-99	Minor female performing oral sex on adult male	Fantastic Site lolita_06.jpg
27	09-02-99	Adult male performing anal intercourse with minor female	Fantastic Site lolita_21.jpg
28	09-02-99	Lascivious exhibition of minor female genitals	Fantastic Site lolita_27.jpg

Private-Priority-Special Acceptance, By: Grantee, under signature (Seal)
and seal, Nunc Pro Tunc the 17th day of May, 2000.

Thomas Kent Reedy

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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
(Seal)

Thomas Kent Reedy

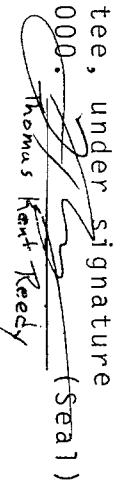
<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
29	09-02-99	Adult male performing genital intercourse on minor female	Fantastic Site lolita_40.jpg
30	09-02-99	Adult male performing genital intercourse with minor female	Fantastic Site lolita_45.jpg

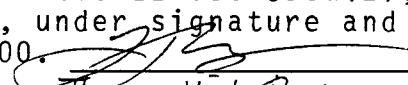
COUNTS 31 through 37

For each count stated and on or about the date stated for each count in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and BORIS GREENBERG**, Defendants, did knowingly and unlawfully transport and cause to be transported, in interstate and foreign commerce by various means including computer, the production of a visual depiction involving the use of a minor person engaging in sexually explicit conduct and such visual depiction was of such conduct as stated for each count at the internet site and image stated for each count. Each count a violation of Title 18, United States Code, Sections 2252 and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
31	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm files video7.mpg
32	06-15-99	Minor female masturbating	Lolitas Land mpg and rm files videos59.rm
33	06-15-99	Minor female lasciviously exposing genitals	Lolitas Land mpg and rm files videos58.rm

private-Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc Pro Tunc the 17th day of May, 2000.


Thomas K. Reedy (Seal)

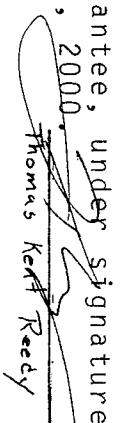
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to the Act evidenced at Title 12 USC §95a(2),
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the 17th day of May, 2000. 
Thomas Kent Reedy (Seal)

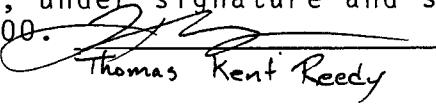
<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
34	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm file video23.mpg
35	06-15-99	Adult female masturbating minor female	Lolitas Land mpg and rm files videos28.mpg
36	06-15-99	Minor female masturbating adult male	Lolitas Land mpg and rm files videos45.mpg
37	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm files videos47.mpg

COUNTS 38 through 44

For each count stated and on or about the date stated for each count in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and HANNY INGGANATA**, Defendants, did knowingly and unlawfully transport and cause to be transported, in interstate and foreign commerce by various means including computer, the production of a visual depiction involving the use of a minor person engaging in sexually explicit conduct and such visual depiction was of such conduct as stated for each count at the internet site and image stated for each count. Each count a violation of Title 18, United States Code, Sections 2252 and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
38	09-02-99	Adult male performing genital intercourse with minor female	Special Site 10st.jpg

Private-Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc Pro Tunc the 17th day of May, 2000. 
(Seal)

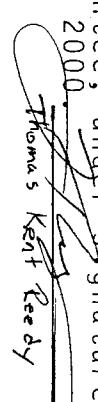
Negotiable, special deposit, private priority, to the order of
the United States, for full acquittance and discharge, pursuant to
the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000.  (Seal)

Thomas Kent Reed

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
39	09-02-99	Minor female masturbating	Special Site 6y.jpg
40	09-02-99	Adult male touching penis to vagina of minor female	Special Site 18.jpg
41	09-02-99	Minor female masturbating adult male	Special Site 71.jpg
42	09-02-99	Male performing genital intercourse with minor female	Special Site 11f.jpg
43	09-02-99	Minor female performing oral sex on adult male	Special Site 75.jpg
44	09-02-99	Adult male performing anal sex on minor female	Special Site 83.jpg

COUNT 45 CONSPIRACY

1. The Grand Jury realleges and incorporates into this count the allegations of Section A and C of Count 1 of this Indictment as an introduction of the conspirators and manner and means of accomplishing this conspiracy.
2. Beginning in and approximately 1997 and continuing to and including the date of this Indictment, **THOMAS REEDY, JANICE REEDY, LANDSLIDE, INC., R. W. KUSUMA, BORIS GREENBERG, and HANNY INGGANATA**, Defendants and conspirators, knowingly agreed and conspired to transport and cause to be transported in interstate and foreign commerce by various means, including by computer, visual depictions of child pornography.
2. In order to accomplish the objects of the conspiracy, the Defendants committed, among

Private Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc pro Tunc the 17th day of May, 2000.

 Thomas Kent Reedy

Negotiable, special deposit, private, priority, to the order of
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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
 (Seal)

Thomas Kent Reedy

others, the incorporated allegations contained in counts 46 through 88, as overt acts in furtherance of the conspiracy. All in violation of Title 18, United States Code Section 2252A(a)(1) and (b)(1).

COUNTS 46 through 69

For each count stated and on or about the date stated for each count, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC.**, Defendants, did knowingly and unlawfully transport and cause to be transported in interstate and foreign commerce by various means including by computer, child pornography of visual depictions of the conduct as stated for each count, at the internet site and image stated for each count. Each count a violation of Title 18, United States Code Sections 2252A and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
46	05-06-99	Lascivious Exhibition of minor female genitals and pubic area in play pool	Blackcat Lolita Photo Series bc_002.jpg
47	05-06-99	Oral sex contact by minors with lascivious genital exhibition	Lolita Hardcore gal01_005.jpg
48	05-06-99	Male and female minors in lascivious exhibition of genitals and pubic area	Lolita Hardcore gal01_008.jpg
49	05-06-99	Minor female performing oral sex on minor male with lascivious genital exhibition	Lolita Hardcore gal01_003.jpg
50	05-06-99	Minor male and female in lascivious exhibition of genitals and pubic area	Lolita Hardcore gal01_007.jpg

Private Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc Pro Tunc the 17th day of May, 2000.

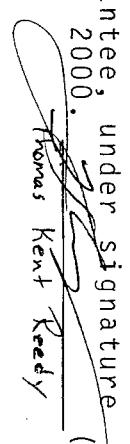

 Thomas Kent Reedy
 (Seal)

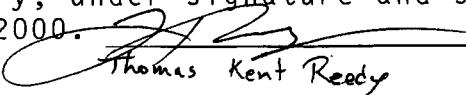
Negotiable, special deposit, private, priority, to the order of
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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th ;day of May, 2000. 

Thomas Kent Reedy

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
51	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-00.jpg
52	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-07.jpg
53	05-06-99	Minor female in lascivious exhibition of genitals and pubic area	Lolita World ab-12.jpg
54	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_001.jpg
55	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_004.jpg
56	05-06-99	Minor male in lascivious exhibition of genitals and pubic area	Lolita World erec_007.jpg
57	06-11-99	Adult male performing genital intercourse with minor female	Child Rape sample1.jpg
58	06-11-99	Minor female performing oral sex on an adult male	Child Rape sample3.jpg
59	06-11-99	Minor female in bondage performing oral sex on adult male	Child Rape sample5.jpg
60	06-15-99	Adult performing oral sex on minor female	Children of God 1.jpg
61	06-15-99	Minor female performing oral sex on a male	Children of God 105.jpg

Private-Priority-Special Acceptance, By: Grantee, under signature and seal, Nunc Pro Tunc the 17th day of May, 2000.


Thomas Kent Reed
(Seal)

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the United States, for full acquittance and discharge, pursuant
to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
Thomas Kent Reedy (Seal)

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
62	06-15-99	Adult male performing genital intercourse with minor female	Children of God 96.jpg
63	06-15-99	Minor female masturbating adult male	Children of God a13.jpg
64	06-15-99	Minor female performing oral sex on adult male	Children of God a59.jpg
65	06-11-99	Minor female lascivious exhibition of genitals	Just Grow Up 3.jpg
66	06-11-99	Lascivious exhibition of genitals of minor male and minor female	Just Grow Up 35.jpg
67	06-11-99	Minor female masturbating adult male	Just Grow Up 45.jpg
68	06-11-99	Minor female masturbating adult male	Just Grow Up cindy14.jpg
69	06-15-99	Minor female performing oral sex on an adult male	Children Forced to Porn 252.jpg

COUNTS 70 through 74

For each count stated and on or about the date stated for each count, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and R. W. KUSUMA**, Defendants, did knowingly and unlawfully transport and cause to be transported in interstate and foreign commerce by various means including by computer, child pornography of visual depictions of the conduct as stated for each count, at the internet site and image stated for each count. Each count a violation of Title 18,

Private-Priority Special Acceptance, By: Grantee under signature
 and seal, Nunc Pro Tunc the 17th day
 of May, 2000.
 (Seal)

Thomas Kent Reedy

Negotiable, special deposit, private, priority, to the order of
the United States, for full acquittance and discharge, pursuant
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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 
(Seal)

Thomas Kent Reedy

United States Code Sections 2252A and 2.

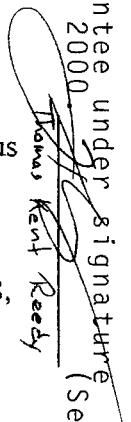
<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
70	09-02-99	Minor female performing oral sex on adult male	Fantastic Site lolita_06.jpg
71	09-02-99	Adult male performing anal intercourse with minor female	Fantastic Site lolita_21.jpg
72	09-02-99	Lascivious exhibition of minor female genitals	Fantastic Site lolita_27.jpg
73	09-02-99	Adult male performing genital intercourse on minor female	Fantastic Site lolita_40.jpg
74	09-02-99	Adult male performing genital intercourse with minor female	Fantastic Site lolita_45.jpg

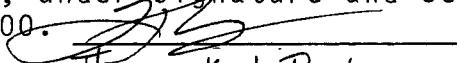
COUNTS 75 through 81

For each count stated and on or about the date stated for each count, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and BORIS GREENBERG**, Defendants, did knowingly and unlawfully transport and cause to be transported in interstate and foreign commerce by various means including by computer, child pornography of visual depictions of the conduct as stated for each count, at the internet site and image stated for each count. Each count a violation of Title 18,

United States Code Sections 2252A and 2.

Private-Priority-Special Acceptance, BY: Grantee under signature (Seal)
and seal, Nunc pro Tunc the 17th day of May, 2000.



Negotiable, special deposit, private, priority, to the order of
The United States, for full acquittance and discharge, pursuant
to the Act evidenced at Title 12 USC §95a(2),
By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000. 

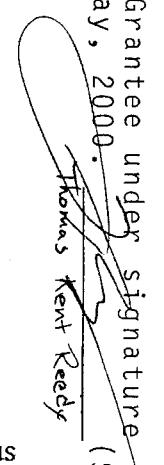
Thomas Kent Reedy

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
75	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm files video7.mpg
76	06-15-99	Minor female masturbating	Lolitas Land mpg and rm files videos59.rm
77	06-15-99	Minor female lasciviously exposing genitals	Lolitas Land mpg and rm files videos58.rm
78	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm file video23.mpg
79	06-15-99	Adult female masturbating minor female	Lolitas Land mpg and rm files videos28.mpg
80	06-15-99	Minor female masturbating adult male	Lolitas Land mpg and rm files videos45.mpg
81	06-15-99	Minor female performing oral sex on adult male	Lolitas Land mpg and rm files videos47.mpg

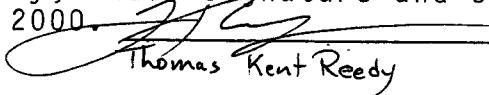
COUNTS 82 through 88

For each count stated and on or about the date stated for each count, in the Fort Worth Division of the Northern District of Texas, and elsewhere, **THOMAS REEDY, JANICE REEDY, and LANDSLIDE, INC., and HANNY INGGANATA**, Defendants, did knowingly and unlawfully transport and cause to be transported in interstate and foreign commerce by various means including by computer, child pornography of visual depictions of the conduct as stated for

Private-Priority-Special Acceptance, By: Grantee under signature and seal, Nunc Pro Tunc the 17th day of May, 2000.


 Thomas Kent Reedy
 (Seal)

Negotiable, special deposit, private, priority, to the order of
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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc,
the 17th day of May, 2000.


Thomas Kent Reedy

each count, at the internet site and image stated for each count. Each count a violation of Title 18, United States Code Sections 2252A and 2.

<u>Count</u>	<u>Date</u>	<u>Conduct</u>	<u>Site and Image</u>
82	09-02-99	Adult male in genital intercourse with minor female	Special Site 10st.jpg
83	09-02-99	Minor female masturbating	Special Site 6y.jpg
84	09-02-99	Adult male touching penis to vagina of minor female	Special Site 18.jpg
85	09-02-99	Minor female masturbating adult male	Special Site 71.jpg
86	09-02-99	Male performing genital intercourse with minor female	Special Site 11f.jpg
87	09-02-99	Minor female performing oral sex on adult male	Special Site 75.jpg
88	09-02-99	Adult male performing anal sex on minor female	Special Site 83.jpg

FORFEITURE

The allegations in Counts 1 through 88 of the Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.

As a result of the offenses, alleged in Counts 1 through 88, **THOMAS REEDY, JANICE REEDY or LANDSLIDE, INC.**, jointly or severally, shall forfeit to the United States-

(1) any visual depiction described in section 2252 and 2252A of Title 18, United States Code,

Private-Priority-Special Acceptance, By: Grantee under signature and seal, Nunc pro Tunc the 17th day of May, 2000.

Thomas Reedy Reedy (Seal)

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the 17th day of May, 2000.  (seal)

Thomas Kent Reedy

or any other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of the above sections;

(2) any property constituting, or derived from, any proceeds the Defendant obtained directly or indirectly as a result of the violation of Counts 1 through 88 ;

The intention to seek forfeiture includes the following property(ies):

(1) CASH PROCEEDS

Approximately \$1,111,266.00 in United States currency, in that such sum in aggregate constitutes the proceeds derived from the criminal violation(s).

If any of the property described in the above forfeiture allegation, as a result of any act or omission of the Defendant—

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o) and Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said Defendant up to the value of the above named sum.

All in violation of Title 18, United States Code, Section 2253.

COUNT 89

On or about September 8, 1999, in the Fort Worth Division of the Northern District of Texas, **THOMAS REEDY, JANICE REEDY, AND LANDSLIDE, INC.**, did knowingly and unlawfully possess a computer disk and computer material that contained approximately 50 images of child

private-priority-Special Acceptance, By: Grantee under signature and seal, Nunc pro Tunc the 17th day of May, 2000, *Thomas Rent Reedy* (Seal)

Negotiable, special deposit, private, priority, to the order of the United States, for full acquittance and discharge, pursuant to the Act evidenced at Title 12 USC §95a(2),

By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc, the 17th day of May, 2000.


Thomas Kent Reedy

(Seal)

pornography that were produced by means of computer using material that had been shipped and transported in interstate and foreign commerce.

A violation of Title 18, United States Code, Section 2252A.

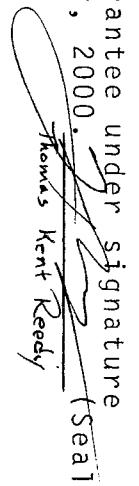
A TRUE BILL


E. Cox
FOREMAN OF THE GRAND JURY

PAUL E. COGGINS
UNITED STATES ATTORNEY

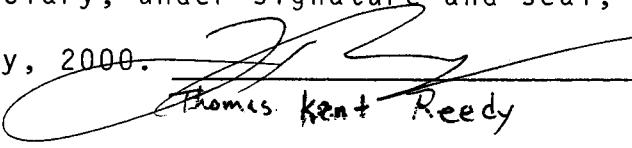

TERRI M. MOORE
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private-Priority-Special Acceptance, By: Grantee under signature
and seal, Nunc pro Tunc the 17th day of May, 2000.

Thomas Kent Reedy (Seal)

Negotiable, special deposit, private, priority, to the order of the United States, for full acquittance and discharge, pursuant to the Act evidenced at Title 12 USC §95a(2),

By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc, the 17th day of May, 2000.

 (Seal)

Thomas Kent Reedy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

vs.

THOMAS REEDY (1)
JANICE REEDY (2)
LANDSLIDE, INC. (3)
R.W. KUSUMA (4)
BORIS GREENBERG (5)
HANNY INGGANATA (6)

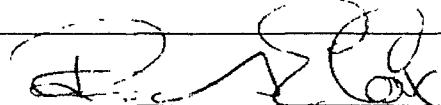
INDICTMENT

18 U.S.C. §§ 2252, 2252(a)(1) and (b)(1), 2252A, 2252A(a)(1) and (b)(1), 2253 and 2

Sexual Exploitation of Minors;
Activities Relating to Material Constituting or Containing Child Pornography;
Criminal Forfeiture; and Aiding and Abetting

(89 COUNTS)

A True bill,

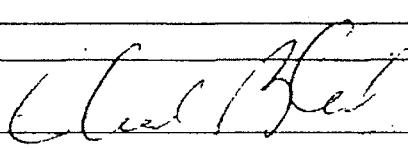


FORT WORTH

Foreman

Filed in open court this 17th day of May, A.D., 2000

Clerk

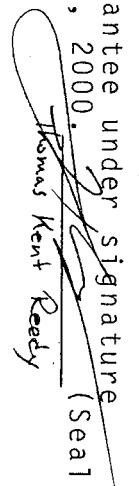


UNITED STATES DISTRICT JUDGE/MAGISTRATE JUDGE

Defendants THOMAS REEDY, JANICE REEDY, LANDSLIDE, INC., on bond

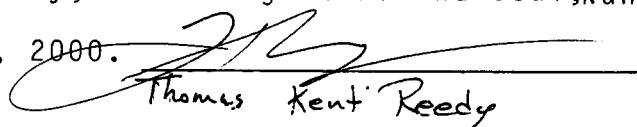
Defendants R.W. KUSUMA, BORIS GREENBERG, HANNY INGGANATA - warrants pending

Private-Priority-Special Acceptance, By: Grantee under signature
and seal, Nunc PRO Tunc the 17th day
of May, 2000.

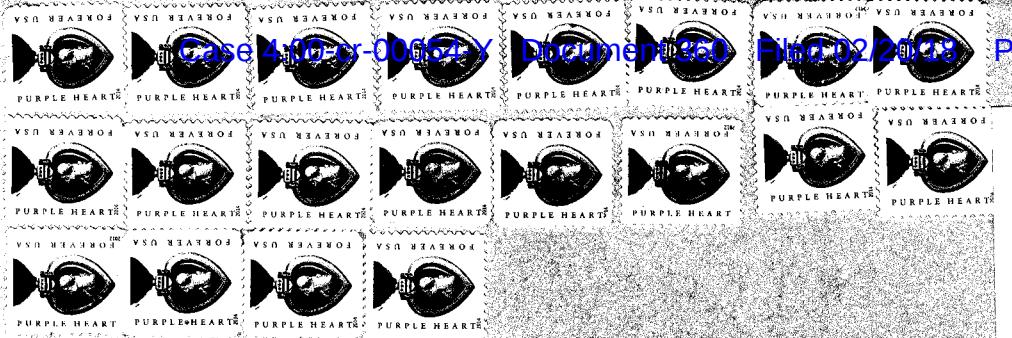

Thomas Kent Reedy (Seal)

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By: Grantor-Beneficiary, under signature and seal, Nunc Pro Tunc, the 17th day of May, 2000.


Thomas Kent Reedy

(seal)



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Page 51 of 51 PageID 1092

OF THE RETURN ADDRESS, POLICY, OR
CERTIFIED MAIL



1002 4690 0000 0547 707

⇒ 25673-177 ⇒
Nancy Doherty-Court Clerk
Or Successors
501 W 10TH ST
FORT WORTH, TX 76102
United States

Thomas Roedy 25678-177
United States Penitentiary
P.O. Box 1000
Marion, Ill. 62959